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1 Q. -- after 3:30?

2 A. Yes.

3 Q. Were those his only duties?

4 A. Not when he first got there. He was
5 helping Ms. Darlene Maye.

6 Q. I'm talking about in your classroom in
7 the middle of '05 when he was a
8 co-teacher with you.

9 A. Those were his duties.

10 Q. And you're saying he didn't do those
11 duties?

12 A. He didn't do those duties.

13 Q. And the part -- and when you're saying
14 he didn't do those duties, the part he
15 failed in was the lesson plan,
16 implementing the lesson plan?

17 A. And helping with the children.

18 Q. After you left at 3:30?

19 A. During -- twelve, going into nap room
20 and help laying the cots and getting
21 the children prepared for naptime.

22 Q. So you're saying he didn't help you
23 enough?

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1 A. No. He didn't help me on the
2 playground. He didn't help me at
3 naptime. He didn't help in the
4 classroom.

5 Q. Okay.

6 A. He's supposed to been helping me with
7 all that.

8 Q. And he didn't help you?

9 A. No.

10 Q. And you feel like First United
11 Methodist Church and Darlene Maye have
12 discriminated against you because of
13 your color, your gender?

14 A. Gender.

15 Q. Gender, by his failure to be the
16 employee that you wanted him to be.
17 That's your claim?

18 A. No. That she said he was supposed to
19 be.

20 Q. That she said he was supposed to be?

21 A. Right.

22 Q. So where's the discrimination? Help me
23 there. That's what I'm missing.

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1 Where's the discrimination?

2 A. I was required to do this.

3 MR. HURST: Say the word
4 preferential treatment. He was given
5 preferential treatment over you. We
6 can move on. I mean, if you're not
7 sufficed with the answer -- I mean,
8 we've been on the same question.

9 MR. GARRETT: Well, it's the --

10 MR. HURST: Well, just put it
11 in your brief. That's what I'm saying.
12 If you're not satisfied with the
13 answer, just put it in your brief.

14 MR. GARRETT: I know. I'm just
15 trying -- this is very bad Complaint,
16 so I'm trying to clean them up. It's a
17 nightmare trying to figure out what --

18 MR. HURST: Well, it's a
19 nightmare, too, on the other end. So
20 if you want to do that, then do that on
21 your personal time.

22 MR. GARRETT: No. I mean, I've
23 got the right to ask her the question

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1 and find out --

2 MR. HURST: You don't have the
3 right to badger the witness.

4 MR. GARRETT: I'm not
5 badgering.

6 MR. HURST: Yes, you are,
7 because we've been on this same
8 question forever.

9 MR. GARRETT: No, I haven't.

10 MR. HURST: Well, you have your
11 answer. Well, if there is no answer,
12 then you know how to write and put it
13 in a Complaint and respond and say,
14 Well, I don't think there's an answer.
15 Dismiss it.

16 MR. GARRETT: Well, anyway.

17 Q. What was -- when Mr. Lamar was not
18 helping you, what was he doing?

19 A. Sitting in the office.

20 Q. Every day?

21 A. Every day.

22 Q. Did he -- at the time you all worked
23 together, did he ever do -- did he ever

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1 do a good job, as far as you know?

2 (No immediate response given.)

3 Q. When you all were working together, did
4 he ever do a good job?

5 A. Did he ever do a good job?

6 Q. Yeah, when you all worked together.

7 A. That's what I'm telling you, we didn't
8 work together. I didn't see him.

9 Q. Okay. When you say you didn't see him,
10 you didn't see him other than naptime
11 and at 3:30?

12 A. Yes.

13 Q. And he was supposed to be in there with
14 you all day, is what you're saying?

15 A. At twelve.

16 Q. Twelve on?

17 A. Right.

18 Q. And you left at 3:30?

19 A. Yes, sir.

20 Q. Who would watch the kids after you
21 left?

22 A. He would.

23 Q. Okay. So after you -- really, your

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1 complaints with regard to how he would
2 help you would be between three and
3 when you left at 3:30?

4 A. Twelve.

5 Q. I'm sorry. You're right. Twelve and
6 3:30?

7 A. Yes, sir.

8 Q. And at twelve -- when do they start
9 napping? Do they start napping at
10 twelve?

11 A. Yes.

12 Q. And they napped for how long?

13 A. Two hours.

14 Q. So they would be napping for two hours?

15 A. Yes, sir.

16 Q. Until two?

17 A. Right.

18 Q. So your complaint is his failure to
19 help you between two and 3:30 in the
20 afternoon, an hour and a half?

21 A. He didn't help during the lesson plan
22 either.

23 Q. Right, between two and -- that's what

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1 I'm saying, between two and 3:30,
2 that's when you expected him to do
3 that?

4 A. Yes, sir.

5 Q. That hour and a half?

6 A. Yes, sir.

7 Q. Okay. Ms. Perryman, as a female
8 employee, was given excessive,
9 burdensome, and unstable working
10 conditions. Tell me about that.
11 Excessive, burdensome, and unstable
12 working conditions.

13 A. That's the workload was put all on me
14 when -- the assistant never came in to
15 help, so that was a burden on me.

16 Q. This is Mr. Lamar again you're talking
17 about?

18 A. Yes.

19 Q. Okay. And you think that burden, that
20 you should have been assisted some more
21 and the fact that he didn't live up to
22 your expectations, you were burdened?

23 A. Yes, sir.

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1 Q. Again, do you feel like you were
2 burdened because you were a female?

3 A. Yes, sir.

4 Q. The First United Methodist -- another
5 complaint. The First United Methodist
6 Church is also fostering a policy where
7 female employees are more likely to be
8 disciplined or terminated than males.
9 What policy are you referring to?

10 (No immediate response given.)

11 Q. There's only one -- there's only one
12 male up there?

13 A. Right.

14 Q. So what policy are you talking about?

15 A. The policy and procedures of being
16 terminated, how you have to go before
17 the board. Before you are terminated,
18 you have to go before the board and you
19 have to try to stop this from
20 happening.

21 Q. Stop what from happening?

22 A. The discrimination suit. It -- okay.

23 Let me word it right for you so you can

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1 understand. In their policy, it states
2 that to be terminated you have to go
3 before the board. I didn't go before
4 the board.

5 Q. Okay.

6 A. I was just terminated.

7 Q. So you believe there's a policy at
8 First United Methodist Church that
9 prior to being discharged you have to
10 be brought before a board?

11 A. Yes.

12 Q. What board?

13 A. The administrator, the board of
14 committee.

15 Q. I'm sorry?

16 A. The committee, the board of committee.

17 Q. The board of committee?

18 A. Yes.

19 Q. And is this a church board?

20 A. Yes, sir.

21 Q. Who's on it? Do you know?

22 A. No.

23 Q. You're saying that you were not brought

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1 before this committee prior to being
2 discharged?

3 A. No, sir.

4 Q. And that was due to your race or your
5 gender?

6 A. Gender.

7 Q. That was because you were female?

8 A. Yes, sir.

9 Q. So you believe that -- okay. So you're
10 saying that you were not brought before
11 this panel prior to being fired because
12 you're a female?

13 A. Yes, sir.

14 Q. And that they've established a pattern
15 and practice of not allowing females to
16 be seen before this board before being
17 terminated? Is that your claim?

18 A. Yes, sir.

19 Q. What other females haven't been able to
20 go before this board prior to being
21 terminated?

22 MR. HURST: If you don't know,
23 say I don't know.

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1 A. I don't know.

2 Q. On the alternative, what males have
3 been allowed to?

4 A. I don't know.

5 Q. So you don't have any basis for that
6 claim?

7 A. No, sir.

8 Q. Okay. You've made claims in this case
9 for mental distress, emotional pain and
10 anguish, lost wages. What are you
11 claiming in lost wages?

12 A. My hours, the twelve hours from '01 to
13 termination.

14 Q. Okay. So you're lost --

15 MR. HURST: You're -- well, go
16 ahead.

17 Q. So your lost wages claim in this case
18 is for the twelve hours a year between
19 '01 and '05 for your certificate
20 training hours you feel like you should
21 have received compensation for?

22 A. Yes, sir.

23 Q. Are there any other lost wages besides